

ROSENTHAL, MONHAIT & GODDESS, P. A.

ATTORNEYS AT LAW
SUITE 140L 919 MARKET STREET

P. O. BOX 1070
WILMINGTON, DELAWARE 19899-1070

TELEPHONE (302) 656-4433
FACSIMILE (302) 658-7567

JOSEPH A. ROSENTHAL
NORMAN M. MONHAIT
JEFFREY S. GODDESS
CARMELLA P. KEENER
EDWARD B. ROSENTHAL
JESSICA ZELDIN

July 9, 2007

VIA ELECTRONIC FILING

The Hon. Gregory M. Sleet
United States District Judge
U.S. District Court for the District of Delaware
844 North King Street, Room 4234
Wilmington, Delaware 19801

RE: ***Cannon, et al. v. MBNA Corporation, et al.;***
C.A. No. 05-429 GMS

Dear Chief Judge Sleet:

Following the scheduling conference before Your Honor last Thursday, counsel have worked together to finalize the last few details for the Scheduling Order. Accordingly, and as directed, I present an agreed draft of a Scheduling Order for Your Honor's consideration and entry, if deemed appropriate.

We think we should point out a very few spots where what we've provided diverged slightly from the format in the form on Your Honor's website. First, in paragraph 3, we first set out the deadline for "fact discovery," and then have a passage addressing expert discovery separately (at para. 3(b)). Be assured, however, that these component dates are the same as were set in the conference, with one exception. That exception is to allow for the fact that the date first pegged for the close of expert discovery, June 15th, proves to be a Sunday, so we substituted June 16th.

The other slight divergence is in para. 10 (concerning the pretrial process) and para. 11 (re: motions *in limine*). As Your Honor will note, we provided component dates for the tasks leading up to the pretrial filing date of December 1, 2008.

July 9, 2007

Page 2

If Your Honor has any questions, concerns or directions to be taken up with counsel, of course counsel stand ready to respond.

Respectfully yours,



Jeffrey S. Goddess (Del. Bar No. 630)

JSG/cmw

cc: Richard H. Morse, Esquire (Via electronic filing)
Richard C. Pepperman, II, Esquire (Via e-mail)
Mark C. Rifkin, Esquire (Via e-mail)
Clerk, U.S. District Court